

IN RE:	:	
WILLIAM DAVID HERMAN	:	CASE NO. 1-17-00300-HWV
aka BILL D. HERMAN	:	
Debtor	:	
	:	CHAPTER 13
WELLS FARGO BANK, NATIONAL	:	
ASSOCIATION, AS TRUSTEE UNDER	:	
POOLING AND SERVICING AGREEMENT	:	
DATED AS OF OCTOBER 1, 2006	:	
SECURITIZED ASSET BACKED	:	
RECEIVABLES LLC TRUST 2006-WM2	:	
MORTGAGE PASS-THROUGH	:	
CERTIFICATES, SERIES 2006-WM2	:	
Movant	:	
v.	:	
	:	
WILLIAM DAVID HERMAN	:	
aka BILL D. HERMAN	:	
DEBORAH A. HERMAN (Non-filing Co-Debtor):	:	
Respondents	:	

AND NOW, comes Debtor, William David Herman, by and through his attorney, Gary J.

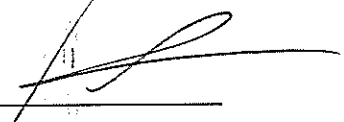

1. Admitted in part and denied in part. Debtor has no knowledge as to the identity of the Movant. Strict proof is demanded.

3. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is
ded.

4. Admitted in part and denied in part. See response to paragraph 5.
5. Admitted in part and denied in part. Debtor made one payment the week of December 10, 2018. After receiving credit for same, Debtor believes he is, at most, one payment behind post-petition. Strict proof is demanded as to the amount of the arrears. Further, Movant is not entitled to fees and costs since the amount of Movant's claim exceeds the fair market value of the property. 11 U.S.C. § 506(b), United States v. Timbers of Inwood Forest Assocs., Ltd., 484 U.S. 365 (1988).
6. Admitted in part and denied in part. It is denied that there are adequate grounds for relief. See response to paragraph 5.
7. Denied. See response to paragraph 5.
8. Denied. See response to paragraph 5.
9. Denied. Movant should not communicate directly with Debtor. All communications should go through Debtor's counsel.
10. Admitted in part and denied in part. Debtor has no knowledge as to whether Movant is the proper party to bring this action. Strict proof is demanded.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtor

DATED: 12-20-18

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE UNDER POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2006 SECURITIZED ASSET BACKED RECEIVABLES LLC TRUST 2006-WM2 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-WM2 FOR RELIEF FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY UNDER §362 and §1301 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001 upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

THOMAS SONG, ESQUIRE
PHELAN HALLINAN DIAMOND & JONES, LLP
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

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DATED: 12/20/18